

1 **JOHN C. LEMON**

California Bar No. 175847

2 **LAW OFFICES OF JOHN C. LEMON, APC**

1350 Columbia Street, Suite 600

3 San Diego, California 92101

Telephone: (619) 794-0423

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5 Attorney for **Mr. Barrera-Santana**

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE JOHN A. HOUSTON)

11 UNITED STATES OF AMERICA,) Criminal No. 08cr1551-JAH

12 Plaintiff,)

13 v.)

14 **OSCAR IGNACIO**)

BARRERA-SANTANA (2),)

15 Defendant.)

16 **NOTICE OF MOTION AND**
MOTION TO PRODUCE DISCOVERY

17
18 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
LUELLA CALDITO, ASSISTANT UNITED STATES ATTORNEY.

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20 **PLEASE TAKE NOTICE** that on June 23, 2008 at 8:30 a.m., or as soon thereafter as counsel may
21 be heard, the defendant, Oscar Ignacio Barrera-Santana, by and through his attorney, John C. Lemon, will
22 ask this Court to enter an order granting the motion listed below.

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MOTION

Oscar Ignacio Barrera-Santana, the accused in this case, by and through his attorney, John C. Lemon, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this court to grant the following motion:

1) Compel the production of discovery.

This motion is based upon the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on this motion.

Respectfully submitted,

Dated: June 6, 2008

/s/ John C. Lemon
JOHN C. LEMON
Attorney for Mr. Barrera-Santana